Dear FCC Chairman and Commissioners,

I write in response to your request for comment on the deregulation initiative—and I strongly support the kind of action you're advocating—with specific regard to the recent addition of a felony question on the Amateur Radio license application. Notably, this question was introduced on September 7, 2017 despite the fact that the Amateur Radio Service has operated effectively for decades—indeed, nearly a century—without such an intrusive inquiry.

This new requirement is emblematic of the very sort of needless regulatory burden that modern deregulation efforts seek to eliminate. The process is profoundly opaque, leaving applicants and FCC staff alike unable to accurately predict whether a particular criminal history will result in disqualification. This lack of clarity not only leads to wasted effort and application fees for individuals who ultimately find themselves barred under an arbitrary policy, but also incurs unnecessary administrative costs.

Critically, there is no supporting evidence that this felony question improves the safety or integrity of the airwaves. The vast majority of those who seek to use radio frequencies do so legally, and the Amateur Radio community is renowned for its commitment to self-regulation—actively monitoring, reporting, and even disciplining bad actors. Given that communications on amateur frequencies occur in a public forum where anyone may listen, there is little opportunity for misdeeds to go unnoticed. Furthermore, applicants voluntarily submit their names and contact information to the FCC's public database, eliminating any notion of anonymity.

There are clear examples of the policy's failure in practice. In my own experience, I have been waiting more than four months for a response after submitting all the required documentation, and I know of others who have endured waits exceeding a year. This inefficiency burdens not only law-abiding citizens trying to comply with FCC rules but also strains the FCC's resources in reviewing cases that have little to no relevance to preventing misuse of the airwaves.

In summary, the current process for reviewing applicants who honestly answer the felony question is both inefficient and ineffective. It fails to significantly enhance the security of radio communications while imposing substantial administrative costs and hindering the reintegration of individuals who may have made poor choices in the past but now strive to be responsible, law-abiding members of our society.

I respectfully recommend that this policy be removed. However, if a review process is deemed absolutely necessary, it should be streamlined to focus only on recent felony convictions (within the past 5–7 years) and those directly related to the misuse of radio or broadcasting technology and a demonstrated unwillingness to adhere to rules.

Thank you for considering this comment in your ongoing efforts to modernize and simplify FCC regulations.

Sincerely,

Edward Lewis